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7 *Wal-Mart Stores, Inc.*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MICHELLE ZAPINSKI, an individual;

Case No.: 2:17-cv-02176-APG-NJK

11 Plaintiff,

12 v.  
13 WAL-MART STORES INC., a foreign  
14 corporation d/b/a WAL-MART  
15 SUPERCENTER #1584; DOES 1 through 10,  
inclusive; ROE CORPORATIONS 11 through  
20, inclusive; and ABC LIMITED LIABILITY  
COMPANIES 21 through 30, inclusive,

**STIPULATED PROTECTIVE ORDER  
BETWEEN PLAINTIFF MICHELLE  
ZAPINSKI AND DEFENDANT WAL-  
MART STORES, INC.**

16 Defendant.

17 **STIPULATED PROTECTIVE ORDER**

18 The parties to this action, Defendant Wal-Mart Stores, Inc. and Plaintiff, Michelle Zapinski, by  
19 their respective counsel, hereby stipulate and request that the Court enter a stipulated protective order  
20 as follows:

22 1. The Protective Order shall be entered pursuant to the Federal Rules of Civil Procedure  
23 and applicable local rules for the United States District Court, District of Nevada

25 2. The Protective Order shall govern all materials identified as "Confidential" by the  
26 parties. Disclosed materials claimed to be confidential in nature shall be produced by placing the  
27 following legend on the face of each document and each page so designated "CONFIDENTIAL" or  
28 otherwise expressly identified as confidential. The parties will use best efforts to limit the number of

1 documents designated as "Confidential." Confidential Information in this case shall include  
2 Defendant's policies and procedures and training materials and maps/schematics of the subject  
3 Walmart store.

4       3.       Confidential Information shall be held in confidence by each party or his or her  
5 representatives, attorneys, and agents for use solely for the purposes of this action and not for any  
6 business purpose. Documents designated as confidential may not be disclosed to persons or parties  
7 whose relationship to the dispute between the parties is not reasonably related to the prosecution or  
8 defense of claims litigated.

9       4.       Each counsel shall be responsible for providing notice of the Protective Order and the  
10 terms therein to persons to whom they disclose "Confidential Information," as defined by the terms of  
11 the Protective Order.

12       See order issued  
13 concurrently herewith

~~The parties will file under seal any Confidential Information included in any papers,  
leadings to avoid the public disclosure of said information.~~

14       6.       The termination of this action shall not relieve the parties and persons obligated  
15 hereunder from their responsibility to maintain the confidentiality of information designated  
16 confidential pursuant to this Order.

17       7.       After the final adjudication or resolution of this Lawsuit ("final adjudication" will  
18 include the resolution of any appeals), a party may make a written demand to the other party for the  
19 return of confidential materials, including all copies and reproductions thereof. The party receiving the  
20 written demand shall have thirty (30) days from receipt of the written demand to comply with same.

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22       //

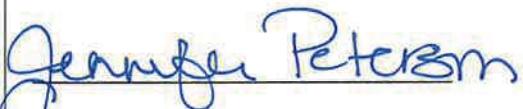
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1       8. Nothing in the Protective Order shall be deemed to preclude any party from seeking  
2 and obtaining, on an appropriate showing, a modification of this Order.

3       9. DATED this 30th day of October, 2017.

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5 

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9       *Attorneys for Plaintiff*  
10      *Michelle Zapinski*

11      */s/ Ryan Kerbow*

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17      *Attorneys for Defendant*  
18      *Wal-Mart Stores, Inc.*

19      The terms of the above stipulation for a protective order by and between Defendant Wal-Mart  
20      Stores, Inc. and Plaintiff Michelle Zapinski, by their respective counsel, shall hereby be the ORDER  
21      of this Court.

22      DATED November 3, 2017

23        
24      UNITED STATES MAGISTRATE JUDGE